

BEIK LAW FIRM, PLLC
8100 Washington Ave., Suite 1000
Houston, TX 77007

United States Courts
Southern District of Texas
FILED

JUN 18 2019

David J. Bradley, Clerk of Court

Dear Sir:

Regarding Paragraph 1, Defendant has no knowledge as to the facts asserted.

Regarding Paragraph 2, Defendant is not an online infringer of Plaintiff's copyrights.

Regarding Paragraph 3, Defendant has no knowledge as to the facts asserted.

Regarding Paragraph 4, Defendant has no knowledge as to the facts asserted.

Regarding Paragraph 5, Defendant did not commit the tortious conduct alleged in this Amended Complaint.

Regarding Paragraph 6 Defendant has no knowledge as to the facts asserted.

Regarding Paragraph 7, Defendant has no knowledge of venue.

Regarding Paragraph 8, Defendant has no knowledge Malibu Media.

Regarding Paragraph 9, Defendant does reside at address.

Factual Background

Regarding Paragraph 1, Defendant did not use BitTorrent.

Regarding Factual Background 10, 11, 12, 13, 14, 15, 16 – Defendant has no knowledge of BitTorrent.

Regarding Factual Background 17, 18, 19, 20, 21 – Defendant has no knowledge of the plaintiff's investigators activities.

Regarding Factual Background 22 - Defendant has no knowledge of plaintiff's copyrights.

Regarding Factual Background 23- Defendant did not download, copy or distribute any of plaintiff's works.

Regarding Factual Background 24 – Defendant has no knowledge of the plaintiff's investigators activities.

Regarding Factual Background 25 – Defendant is not a BitTorrent user or copyright infringer

Regarding Factual Background 26, 27 – Defendant has no knowledge

Regarding Count 1, Paragraph 28 – Defendant reasserts his denials of those allegations which are untrue in paragraphs 1-27

Regarding Paragraph 29 - Defendant has no knowledge of the plaintiff's copyrights

Regarding Paragraph 30 - Defendant did not use BitTorrent or distribute anything

Regarding Paragraph 31 - Defendant has no knowledge of the Plaintiff or its works

Regarding Paragraph 32 - Defendant did not violate the plaintiff's exclusive rights

Regarding Paragraph 33 - Defendant did not commit any infringements

Regarding Paragraph 33a - Defendant has not or will not in the future infringe or the plaintiff's copyrights.

Regarding Paragraph 33b - Defendant does not have copies of plaintiff's digital files to delete.

Regarding Paragraph 33c- Defendant has not have copies of plaintiff's works on his computer or computers in his possession or control.

Regarding Paragraph 33d – There are no statutory damages because defendant has not infringed on plaintiff's copyrights

Regarding Paragraph 33e- Plaintiff is not entitled to attorney's fee because defendant has not infringed on plaintiff's copyrights

Regarding Paragraph 33f- Plaintiff is not entitled to any future relief because defendant has not infringed on plaintiff's copyrights

By: /s/ Anhvu Truong

Anhvu Truong
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A handwritten signature in black ink, appearing to be 'A. Truong', with a long horizontal stroke extending to the right.